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Document Number:

5) IV-D-62

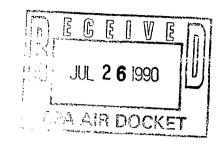
Docket Number:

A-90-16



Jerry G. Jenkins Vice President Fina Oil and Chemical Company Post Office Box 2159 Dallas, Texas 75221 (214) 750-2988

July 20, 1990



Air Docket (LE-131) of EPA Room M-1500 401 M Street SW Washington, D.C. 20460

Gentlemen:

We urge the EPA to approve Ethyl's waiver request for HiTEC 3000 for the following reasons:

- 1. Test data indicates no adverse effect on emission control systems.
- 2. Test data indicates a reduction in NOx and other regulated pollutants.
- 3. It is a commercially proven product in Canada.
- 4. At a constant pool octane, use of HiTEC 3000 will reduce aromatic content of gasoline.
- 5. Less crude oil required to produce a constant volume of gasoline.

We believe Dewey Mark represented the industry well in his testimony in June. We fully concur with his view that the most important benefit of HiTEC 3000 is the added flexibility it gives a refiner to meet the challenges of future regulations.

Sincerely,

Jerry G. Jenkins

JGJ:ja

cc: Mary T. Smith, Director
Field Operations and Support Division
U. S. Environmental Protection Agency
401 M Street SW

Washington, D.C. 20460